

United States Courts
Southern District of Texas
FILED

JUL 26 2016

~~Daniel J. Brackley~~ Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LONTAY LAVELLE YOUNG,	§	CRIMINAL NO.: H-16-
LOUIS JEROME HINES,	§	
KENNETH DEWAYNE COOPER,	§	
BARRY LLOYD JONES,	§	JUDGE
a/k/a Tony Thomas,	§	
JESSE MARKISE McQUEEN,	§	
DENZELL DEVOE LUCIOUS,	§	
TONY DONTREL YOUNG,	§	
TERRY DWIGHT WASHINGTON,	§	
KEVIN CRAIG GRAY,	§	
EDWARD RAY LAVERGNE, Jr.,	§	
DESHAUN DEVON WALDRUP,	§	
ROSS ANTHONY WHITE-LEONARD,	§	
Defendants	§	

16CR0317

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Title 18, United States Code, § 1951(a) -
Conspiracy to Interfere with Commerce by Robbery

INTRODUCTION

At all times material to this Indictment, Family Dollar is a North Carolina based corporation that maintains stores and distribution centers throughout the United States and was engaged in the business of retail sales of consumer goods which are shipped in interstate commerce and which affect interstate commerce.

At all times material to this Indictment, Ben Bridge Jewelers is a Washington based corporation that maintains stores and distribution centers throughout the United States and was engaged in the business of retail sales of consumer goods which are shipped in interstate commerce and which affect interstate commerce.

At all times material to this Indictment, Kay Jewelers is an Ohio based corporation that maintains stores and distribution centers throughout the United States and was engaged in the business of retail sales of consumer goods which are shipped in interstate commerce and which affect interstate commerce.

At all times material to this Indictment, ANF Auto Finance is a Houston, Texas based company engaged in the business of automobile financing and the sale of automobiles, which travel in interstate commerce and which affect interstate commerce.

At all times material to this Indictment, Cash America Pawn is a Fort Worth, Texas based company engaged in the business of retail purchase and sales of consumer goods which are shipped in interstate commerce and which affect interstate commerce.

At all times material to this Indictment, Affordable Furniture is a Houston, Texas based company engaged in the

business of retail sales of consumer goods which are shipped in interstate commerce and which affect interstate commerce.

Beginning on or about October 22, 2015 and continuing until on or about March 17, 2016, in the Houston Division of the Southern District of Texas, and elsewhere,

LONTAY LAVELLE YOUNG,
LOUIS JEROME HINES,
KENNETH DEWAYNE COOPER,
BARRY LLOYD JONES, a/k/a Tony Thomas,
JESSE MARKISE McQUEEN,
DENZELL DEVOE LUCIOUS,
TONY DONTREL YOUNG,
TERRY DWIGHT WASHINGTON,
KEVIN CRAIG GRAY,
EDWARD RAY LAVERGNE, Jr.,
DESHAUN DEVON WALDRUP,
and
ROSS ANTHONY WHITE-LEONARD,

defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and others known and unknown to the Grand Jury, to obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did unlawfully combine, conspire, confederate, and agree with each other, to unlawfully take and obtain property, namely, consumer goods and United States Currency, by means of actual and

threatened force, violence, and fear of injury to those in lawful possession of those items, in violation of Title 18, United States Code, § 1951(a).

MANNER AND MEANS

The unlawful conspiracy was accomplished in the following manner and means:

1. It was part of the conspiracy that co-conspirators would meet and discuss plans to commit the robberies indicted below.
2. It was further part of the conspiracy that one or more co-conspirators would act as lookouts during the commission of the robberies.
3. It was further part of the conspiracy that co-conspirators would enter the store, display firearms, and take by threat of force and actual force, consumer goods and United States currency.
4. It was further part of the conspiracy that co-conspirators would divide the proceeds from the robberies.

OVERT ACTS

In furtherance of this conspiracy, and in order to effect and accomplish its objectives, one or more of the defendants

committed in the Southern District of Texas, and elsewhere, the overt acts alleged in Counts Two through Thirteen of this Indictment which are re-alleged and incorporated herein by reference, in particular:

1. On or about October 22, 2015, LONTAY YOUNG and LOUIS HINES entered the Family Dollar, located at 5901 Wayside, in Houston, Texas, wearing masks and armed with handguns, and ordered employees to give them money. YOUNG and HINES stole approximately \$1,500 worth of cigarettes, which were later recovered from a silver Lexus SUV, observed leaving the scene by a store employee. The masks, clothing, and firearms used by YOUNG and HINES during the robbery were also recovered from this vehicle.

2. On or about January 11, 2016, the Ben Bridge Jewelers located at 2901 S. Capital of Texas Highway Northbound, in Austin, Travis County, Texas was robbed by KENNETH COOPER and BARRY JONES.

3. On January 10, 2016, DENZELL LUCIOUS and JESSE MCQUEEN obtained a red Dodge Challenger in Houston, Texas to use in the robbery. COOPER, JONES, and others known and unknown to the grand jury, drove the Dodge Challenger from

Houston, Texas to Austin, Texas on the morning of January 11, 2016, in order to conduct the robbery.

4. Once in Austin, at approximately 10:55 a.m., COOPER and JONES held the employees at gunpoint, demanding Rolex watches. They stole approximately 45 watches, valued at approximately \$560,000.00.

5. While COOPER and JONES robbed the Ben Bridge Jewelers, others known and unknown to the Grand Jury, including DENZELL LUCIOUS and JESSE MCQUEEN remained in the parking lot, acting as lookouts.

6. A witness observed the robbers leave in a red Dodge Challenger and recorded the license plate number. Austin Police recovered the red Challenger in a nearby church and interviewed the registered owner, who admitted to loaning the car to DENZELL LUCIOUS and JESSE MCQUEEN in Houston, Texas, the day before the robbery. DENZELL LUCIOUS called the registered owner in Houston after the robbery and told her to report the car stolen.

7. On or about January 22, 2016, Kay Jewelers, located at 29300 Northwest Freeway, in Houston, Texas was robbed at 8:30 p.m. by KENNETH COOPER, BARRY JONES, and TONY YOUNG.

The robbers ordered the employees at gunpoint to give them cash and Rolex watches. The approximate value of the loss to Kay Jewelers was \$241,550.00.

8. DENZELL LUCIOUS, JESSE MCQUEEN, and others known and unknown to the Grand Jury, remained in the parking lot, acting as lookouts.

9. The victims of the robbery were able to identify KENNETH COOPER, BARRY JONES, and TONY YOUNG as the robbers from photographic lineups.

10. Photographs and video retrieved from KENNETH COOPER's cellular phone show images of the defendants wearing the Rolex watches stolen from Kay Jewelers. Statements provided to police confirmed that these watches were worn and/or sold by BARRY JONES, JESSE MCQUEEN, TONY YOUNG, DENZELL LUCIOUS, and KENNETH COOPER.

11. On or about March 3, 2016, ANF Auto Finance, located at 6004 North Sheperd Drive, in Houston, Texas was robbed by LONTAY YOUNG, TERRY WASHINGTON, KEVIN GRAY, and EDWARD LAVERGNE, JR. They stole money from the business and customers at gunpoint and fled in a gray Dodge Avenger.

12. A witness to the robbery was able to report a partial license plate of that vehicle. KEVIN GRAY and TERRY WASHINGTON were later arrested in that vehicle.

13. Video surveillance from ANF Auto Finance clearly showed the three robbers were not wearing masks. Victims were able to identify TERRY WASHINGTON, KEVIN GRAY, and EDWARD LAVERGNE, JR. from photographic lineups.

14. GPS location from an ankle monitor worn by LONTAY YOUNG also put him at the location of the ANF Auto Finance robbery.

15. On or about March 9, 2016, Cash America Pawn was robbed by four males, known and unknown to the Grand Jury, including LONTAY YOUNG and DESHAUN WALDRUP. The robbers took approximately \$20,000.00 worth of cash and jewelry from Cash America Pawn.

16. A witness observed the masked robbers fleeing the Cash America Pawn in a silver van and head east on Wimberly Street.

17. Officers found an abandoned silver van nearby off of Wimberly Street. All of the doors were open and the engine was still running. Inside of that van, officers discovered a

Cash America Pawn money bag and a backpack with the identification of DESHAUN WALDRUP.

18. GPS location from an ankle monitor worn by LONTAY YOUNG also put him at the location of the Cash America Pawn robbery.

19. On or about March 17, 2016, LONTAY YOUNG, BARRY JONES, ROSS WHITE-LEONARD, and others known to the Grand Jury, were observed by police robbing the Affordable Furniture store, located at 11314 North Freeway, in Houston, Texas. The robbers ordered the employees at gunpoint to give them cash and open the safe. They stole approximately \$2,300.00.

20. BARRY JONES and ROSS WHITE-LEONARD left the store brandishing firearms. Shots were fired during which time two co-conspirators were shot and killed by police. Police arrested BARRY JONES and ROSS WHITE-LEONARD as they left the store. LONTAY YOUNG was found hiding in a mattress delivery van adjacent to the store.

COUNT TWO

Title 18, United States Code, §§ 1951(a) and 2 - Aiding and
Abetting Interference with Commerce by Robbery

On or about October 22, 2015, in the Houston Division of
the Southern District of Texas, and elsewhere,

LONTAY LAVELLE YOUNG and
LOUIS JEROME HINES,

defendants herein, aiding and abetting each other as well as
others known and unknown to the Grand Jury, did knowingly and
intentionally obstruct, delay, and affect interstate commerce
and the movement of articles and commodities in commerce by
means of robbery, as the terms "commerce" and "robbery" are
defined in Title 18, United States Code, §§ 1951(b)(1) and
(b)(3), in that the defendants did unlawfully take and obtain
the property of Family Dollar, located at 5901 North Wayside,
Houston, Texas, which was in the possession and custody of an
employee of Family Dollar, namely, United States currency and
consumer goods, by means of actual and threatened force,
violence, and fear of injury to those in lawful possession of
those items.

In violation of Title 18, United States Code, §§ 1951(a)
and 2.

COUNT THREE

Title 18, United States Code, §§ 924(c)(1)(A) and 2: -
Aiding and Abetting Using and carrying a firearm during and in
relation to a crime of violence

On or about October 22, 2015, in the Houston Division of
the Southern District of Texas, and elsewhere,

LONTAY LAVELLE YOUNG and
LOUIS JEROME HINES,

defendants herein, aiding and abetting each other and others
known and unknown to the grand jury, did knowingly carry, and
brandish a firearm, namely, a handgun, during and in relation to
a crime of violence for which they may be prosecuted in a court
of the United States, that being Aiding and Abetting
Interference with Commerce by Robbery, as alleged in Count
Three.

In violation of Title 18, United States Code, §§
924(c)(1)(A)(ii), (3)(A), and 2.

COUNT FOUR

Title 18, United States Code, §§ 1951(a) and 2 - Aiding and
Abetting Interference with Commerce by Robbery

On or about January 11, 2016, in the Houston Division of
the Southern District of Texas, and elsewhere,

KENNETH DEWAYNE COOPER,
BARRY LLOYD JONES, a/k/a Tony Thomas,
JESSE MARKISE McQUEEN, and
DENZELL DEVOE LUCIOUS,

defendants herein, aiding and abetting each other as well as others known and unknown to the Grand Jury, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did unlawfully take and obtain the property of Ben Bridge Jewelers, located at 2901 South Capital of Texas Highway Northbound, Austin, Travis County, Texas, which was in the possession and custody of an employee of Ben Bridge Jewelers, namely, jewelry, watches, and United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT FIVE

Title 18, United States Code, §§ 924(c)(1)(A) and 2: -
Aiding and Abetting Using and carrying a firearm during and in
relation to a crime of violence

On or about January 11, 2016, in the Houston Division of
the Southern District of Texas, and elsewhere,

KENNETH DEWAYNE COOPER,
BARRY LLOYD JONES, a/k/a Tony Thomas,
JESSE MARKISE McQUEEN, and
DENZELL DEVOE LUCIOUS,

defendants herein, aiding and abetting each other and others
known and unknown to the grand jury, did knowingly carry, and
brandish, a firearm, namely, a handgun, during and in relation
to a crime of violence for which they may be prosecuted in a
court of the United States, that being Aiding and Abetting
Interference with Commerce by Robbery, as alleged in Count Four.

In violation of Title 18, United States Code, §
924(c)(1)(A)(ii), (3)(A), and 2.

COUNT SIX

Title 18, United States Code, §§ 1951(a) and 2 - Aiding and
Abetting Interference with Commerce by Robbery

On or about January 22, 2016, in the Houston Division of
the Southern District of Texas, and elsewhere,

KENNETH DEWAYNE COOPER,
BARRY LLOYD JONES, a/k/a Tony Thomas,

JESSE MARKISE McQUEEN,
DENZELL DEVOE LUCIOUS, and
TONY DONTREL YOUNG,

defendants herein, aiding and abetting each other as well as others known and unknown to the Grand Jury, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did unlawfully take and obtain the property of Kay Jewelers, located at 29300 Northwest Freeway, Houston, Texas, which was in the possession and custody of an employee of Kay Jewelers, namely, jewelry, watches and United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT SEVEN

Title 18, United States Code, §§ 924(c)(1)(A) and 2: -
Aiding and Abetting Using and carrying a firearm during and in
relation to a crime of violence

On or about January 22, 2016, in the Houston Division of
the Southern District of Texas, and elsewhere,

KENNETH DEWAYNE COOPER,
BARRY LLOYD JONES, a/k/a Tony Thomas,
JESSE MARKISE McQUEEN,
DENZELL DEVOE LUCIOUS, and
TONY DONTREL YOUNG,

defendants herein, aiding and abetting each other and others
known and unknown to the grand jury, did knowingly carry, and
brandish, a firearm, namely, a handgun, during and in
relationship to a crime of violence for which they may be
prosecuted in a court of the United States, that being Aiding
and Abetting Interference with Commerce by Robbery, as alleged
in Count Six.

In violation of Title 18, United States Code, §§
924(c)(1)(A)(ii), (3)(A), and 2.

COUNT EIGHT

Title 18, United States Code, §§ 1951(a) and 2 - Aiding and
Abetting Interference with Commerce by Robbery

On or about March 3, 2016, in the Houston Division of the
Southern District of Texas, and elsewhere,

LONTAY LAVELLE YOUNG,
TERRY DWIGHT WASHINGTON,
KEVIN CRAIG GRAY, and
EDWARD RAY LAVERGNE, Jr.,

defendants herein, aiding and abetting each other as well as others known and unknown to the Grand Jury, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did unlawfully take and obtain the property of ANF Auto Finance, located at 6004 North Shepherd Drive, Houston, Texas, which was in the possession and custody of an employee of ANF Finance, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT NINE

Title 18, United States Code, §§ 924(c)(1)(A) and 2: -
Aiding and Abetting Using and carrying a firearm during and in
relation to a crime of violence

On or about March 3, 2016, in the Houston Division of the Southern District of Texas, and elsewhere,

LONTAY LAVELLE YOUNG,
TERRY DWIGHT WASHINGTON,
KEVIN CRAIG GRAY, and
EDWARD RAY LAVERGNE, Jr.,

defendants herein, aiding and abetting each other and others known and unknown to the grand jury, did knowingly carry, and brandish, a firearm, namely, a handgun, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Interference with Commerce by Robbery, as alleged in Count Eight.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii), (3)(A), and 2.

COUNT TEN

Title 18, United States Code, §§ 1951(a) and 2 - Aiding and Abetting Interference with Commerce by Robbery

On or about March 9, 2016, in the Houston Division of the Southern District of Texas, and elsewhere,

LONTAY LAVELLE YOUNG and
DESHAUN DEVON WALDRUP,

defendants herein, aiding and abetting each other as well as others known and unknown to the Grand Jury, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by

means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did unlawfully take and obtain the property of Cash America Pawn, located at 9102 Jenson Drive, Houston, Texas, which was in the possession and custody of an employee of Cash America Pawn, namely, United States currency and jewelry, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT ELEVEN

Title 18, United States Code, §§ 924(c)(1)(A) and 2: -
Aiding and Abetting Using and carrying a firearm during and in
relation to a crime of violence

On or about March 9, 2016, in the Houston Division of the Southern District of Texas, and elsewhere,

LONTAY LAVELLE YOUNG, and
DESHAUN DEVON WALDRUP,

defendants herein, aiding and abetting each other and others known and unknown to the grand jury, did knowingly carry, and brandish, a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding

and Abetting Interference with Commerce by Robbery, as alleged in Count Ten.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii), (3)(A), and 2.

COUNT TWELVE

Title 18, United States Code, §§ 1951(a) and 2 - Aiding and Abetting Interference with Commerce by Robbery

On or about March 17, 2016, in the Houston Division of the Southern District of Texas, and elsewhere,

LONTAY LAVELLE YOUNG,
BARRY LLOYD JONES, a/k/a Tony Thomas, and
ROSS ANTHONY WHITE-LEONARD,

defendants herein, aiding and abetting each other as well as others known and unknown to the Grand Jury, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did unlawfully take and obtain the property of Affordable Furniture, located at 11300 North Freeway, Houston, Texas, which was in the possession and custody of an employee of Affordable Furniture, namely, United States

currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT THIRTEEN

Title 18, United States Code, §§ 924(c)(1)(A) and 2: -
Aiding and Abetting Using and carrying a firearm during and in
relation to a crime of violence

On or about March 17, 2016, in the Houston Division of the Southern District of Texas, and elsewhere,

LONTAY LAVELLE YOUNG,
BARRY LLOYD JONES, a/k/a Tony Thomas, and
ROSS ANTHONY WHITE-LEONARD,

defendants herein, aiding and abetting each other and others known and unknown to the grand jury, did knowingly carry, and brandish, and discharge, a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Interference with Commerce by Robbery, as alleged in Count Twelve.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(iii), (3)(A), and 2.

Notice of Criminal Forfeiture

Pursuant to Title 18, United States Code, § 924(d)(1), and Title 28, United States Code, § 2461, the United States of America gives notice to the defendants,

LONTAY LAVELLE YOUNG,
LOUIS JEROME HINES,
KENNETH DEWAYNE COOPER,
BARRY LLOYD JONES, a/k/a Tony Thomas
JESSE MARKISE McQUEEN,
DENZELL DEVOE LUCIOUS,
TONY DONTREL YOUNG,
TERRY DWIGHT WASHINGTON,
KEVIN CRAIG GRAY,
EDWARD RAY LAVERGNE, Jr.,
DESHAUN DEVON WALDRUP,
and
ROSS ANTHONY WHITE-LEONARD,

that, in the event of conviction of the offense charged in Counts Three, Five, Seven, Nine, Eleven, or Thirteen, the United States of America shall forfeit all firearms and ammunition involved in or used in a violation of Title 18, United States Code, § 924(c)(1)(A)(ii) and (iii), including, but not limited to:

1. a Hartford Arms, .38 caliber revolver, serial number P10776;
2. a Rossi, .38 caliber revolver, serial number AT60664;
3. a Springfield XD, .45 ACP s/a pistol, serial number XS561749;

4. a Smith & Wesson, .380 caliber semi-automatic pistol, serial number RAH9963; and
5. a Beretta Nano, 9mm caliber semi-automatic pistol, serial number NU131462.

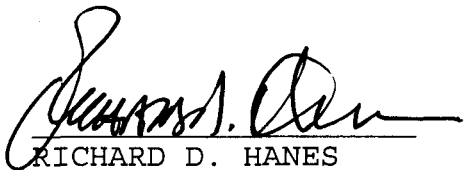
A TRUE BILL:

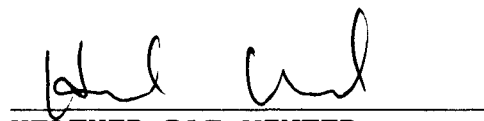
Original Signature on File

FOREMAN OF THE GRAND JURY

KENNETH MAGIDSON
United States Attorney

BY:


RICHARD D. HANES
Assistant United States
Attorney


HEATHER RAE WINTER
Assistant United States
Attorney